

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

TROVARE-CAPITAL GROUP, LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 08-CV-3133 RCC
	)	
SIMKINS INDUSTRIES, INC.,	)	Honorable Judge Gettleman
HARVARD FOLDING BOX CO., INC.,	)	Magistrate Judge Nolan
LINDEN-SUMMER REALTY CO., INC.,	)	
and SOUTH UNION COMPANY, INC.,	)	
	)	
Defendants.	)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR  
OTHERWISE PLEAD TO PLAINTIFF’S COMPLAINT**

NOW COME Defendants, SIMKINS INDUSTRIES, INC., HARVARD FOLDING BOX CO., INC., LINDEN-SUMMER REALTY CO., INC., and SOUTH UNION COMPANY, INC. (collectively “Defendants”), by and through their counsel, Jeffrey T. Kubes and Thomas W. Mulcahy of Crisham & Kubes, Ltd., and respectfully move this Court for an extension of time to August 1, 2008 to answer or otherwise plead to plaintiff’s Complaint. In support thereof, Defendants state as follows:

1. On May 30, 2008, plaintiff a three-count Complaint against Defendants alleging actions for breach of contract and for declaratory relief relating to the proposed sale of Defendants’ business.

2. Defendants were served with summons between June 4, 2008 and June 10, 2008. Defendants, however, just recently retained the undersigned counsel to represent their interests and to petition this Court for the *pro hac vice* admission of Defendants’ Pennsylvania counsel, Timothy C. Russell and Peter N. Kessler.

3. Defendants seek an extension of time through and including August 1, 2008 in which to file their answer or otherwise plead to plaintiff's Complaint.

4. On July 11, 2008, counsel for Defendants conferred with counsel for plaintiff regarding the extension of time to August 1, 2008 and there is no opposition thereto.

WHEREFORE, SIMKINS INDUSTRIES, INC., HARVARD FOLDING BOX CO., INC., LINDEN-SUMMER REALTY CO., INC., and SOUTH UNION COMPANY, INC. (collectively "Defendants") respectfully request that this Court enter an Order granting Defendants until August 1, 2008 to answer or otherwise plead to plaintiff's Complaint and for any other and further relief that this Court deems just and appropriate.

Respectfully submitted,

s/ Thomas W. Mulcahy  
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